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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

STEFANIE PAONESSA, an individual;
AMERICO PAONESSA, an individual,

Plaintiffs,

v.

SIERRA HEALTH AND LIFE INSURANCE
COMPANY, INC., a Nevada corporation;
INNOVATIONS LV, LLC, a Nevada Limited
Liability Company; and DOES 1
through 10, inclusive,

Defendants.

INNOVATIONS LV, LLC, a Nevada Limited
Liability Company,

Crossclaimant,

v.

SIERRA HEALTH AND LIFE INSURANCE
COMPANY, INC., a Nevada corporation; and
DOES I through X, and ROE Business
Entities I through X, inclusive,

Counterdefendants.

CASE NO.: 2:22-cv-2074-GMN-NJK

**STIPULATION AND PROPOSED
ORDER TO EXTEND THE DEADLINE
FOR THE PARTIES TO FILE THE
JOINT STATUS REPORT
(FIRST REQUEST)**

Defendant/Crossclaim Defendant Sierra Health and Life Insurance Company, Inc.
("Sierra Health"), Plaintiffs Stefanie Paonessa and Americo Paonessa ("Plaintiffs"), and
Defendant/Cross-Claimant Innovations LV, LLC ("Innovations") (collectively, the "Parties"), by

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1 and through their undersigned counsel, hereby stipulate and agree to extend the deadline for the
2 Parties to file the joint status report as directed in the Minutes of the Court dated December 15,
3 2022 (ECF No. 4). This is the Parties' first request.

4 1. Plaintiffs originally commenced this action by filing a complaint in the Eighth
5 Judicial District Court, Clark County, Nevada, on September 22, 2022.

6 2. Plaintiffs filed an Amended Complaint on September 30, 2022. (ECF No. 1-1
7 at pp 18-25.)

8 3. On October 27, 2022, Defendant/Cross-Claimant Innovations filed its Answer to
9 Complaint and Crossclaim. (ECF No. 1-1 at pp. 1-17.)

10 4. On November 3, 2022, Sierra Health was served with the Crossclaim via the Nevada
11 Division of Insurance. (*Id.*)

12 5. On November 15, 2022, Sierra Health was then served with the initial pleading,
13 Plaintiffs' Amended Complaint, via the Nevada Division of Insurance. (ECF No. 1-1 at pp 18-25.)

14 6. While pending in the Eighth Judicial District Court, the Parties agreed, and
15 documented their agreement in writing under the local rules of that court, to an extension of time
16 for Sierra Health to respond to the Amended Complaint and the Crossclaim. The Parties believed
17 the litigation of this action was best served by extending the response deadline so that Sierra Health
18 has sufficient time to investigate and respond to the allegations in the pleadings following the timing
19 issues related to service of the pleadings through the Nevada Division of Insurance and the
20 intervening holidays.

21 7. On December 15, 2022, Sierra Health timely removed this action to federal court.
22 (ECF No. 1.)

23 8. On December 15, 2022, this Court entered minute order directing the Parties to
24 submit a joint status report by or before January 16, 2023. (ECF No. 4.)

25 9. On December 16, 2022, Defendant/Cross-claimant Innovations consented to the
26 removal. (ECF No. 5.)

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10. With the removal to federal court and the application of this Court's rules, the Parties were preparing to file this stipulation in this Court, in accordance with LR IA 6-1 and 6-2, to extend the deadline for Sierra Health to respond to the pleadings.

11. The Parties simultaneously engaged in discussions regarding the possible resolution of certain issues and claims between and among them, which would narrow the dispute but may also result in divesting this Court of jurisdiction.

12. To facilitate the resolution and narrowing of the issues, and for good cause on the issue of this Court's jurisdiction, the Parties hereby stipulate and agree to extend to February 28, 2023, the deadline for the Parties to file the joint status report as directed in the Minutes of the Court dated December 15, 2022 (ECF No. 4).

13. The Parties are optimistic that Sierra Health will be voluntarily dismissed with prejudice from the action, and that the remaining issues will concern only state law issues, and thus be subject to stipulated remand back to state court.

This is the first stipulation for an extension of time for Sierra Health to respond to the pleadings.

This stipulation is made in good faith, and not intended to cause delay, and not filed for an improper purpose.

DATED this 11th day of January, 2023.

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ACCELERATED LAW GROUP

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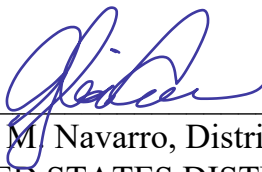
Attorneys for Innovations LV, LLC

ORDER

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED, based on the Parties' stipulation above, that the deadline for the Parties to file the joint status report as directed in the Minutes of the Court dated December 15, 2022 (ECF No. 4) shall be extended to February 28, 2023.

IT IS SO ORDERED.

Dated this 12 day of January, 2023



Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT